

DOCKET SECTION  
BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

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Renewal Of Experimental Classification And	:	
Fees For Weight-Averaged NonLetter-Size	:	Docket No. MC99-1
Business Reply Mail	:	
	:	
Classification And Fees For Weight-Averaged	:	Docket No. MC99-2
NonLetter-Size Business Reply Mail	:	
	:	
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NOTICE BY  
THE BROOKLYN UNION GAS COMPANY,  
KEYSPAN GAS EAST CORPORATION AND  
THE LONG ISLAND POWER AUTHORITY  
OF INTERVENTION AS LIMITED PARTICIPATORS

The Brooklyn Union Gas Company ("Brooklyn Union"), KeySpan Gas East Corporation d/b/a Brooklyn Union of Long Island ("KeySpan Gas") and the Long Island Power Authority (the "Authority") hereby jointly and severally move to intervene in the above-captioned proceeding in accordance with 39 U.S.C. § 3624 and Section 20a of the Commission's Rules of Practice, 39 C.F.R. § 3001.20a. In support of their intervention, the above parties respectfully state:

1. Brooklyn Union, KeySpan Gas and the Authority designate the following persons to receive service in this proceeding:

Michael J. Finnegan  
Administrative Manager in  
Corporate Affairs  
KeySpan Energy  
One MetroTech Center  
Brooklyn, New York 11201

Michael W. Hall  
Cullen and Dykman  
1225 19th Street, N.W.  
Suite 320  
Washington, D.C. 20036

and

Richard Bentley  
Marketing Designs  
9133 Ermantrude Court  
Vienna, Virginia 22182

Edward P. Murphy, Jr.  
Long Island Power Authority  
Vice President & Controller  
333 Earle Ovington Blvd., Ste 403  
Uniondale, NY 11553

2. Brooklyn Union is a corporation duly organized and existing under the laws of the State of New York, with its principal office located at One MetroTech Center, Brooklyn, New York.

3. KeySpan Gas is a corporation duly organized and existing under the laws of the State of New York. KeySpan Gas, as successor to Long Island Lighting Company, is a local distribution company with its principal office located at 175 East Old Country Road, Hicksville, New York.

4. The Authority is a corporate municipal instrumentality and political subdivision of the State of New York with its principal office located at 333 Earle Ovington Blvd, Suite 403, Uniondale, New York.

5. Brooklyn Union is engaged primarily in the purchase and distribution at retail of natural gas in a territory consisting of the Boroughs of Brooklyn and Staten Island and a portion of the Borough of Queens, all located within the City of New York and containing a population of approximately four million.

6. KeySpan Gas is engaged primarily in the purchase and distribution at retail of natural gas on Long Island, New York, in the Counties of Nassau and Suffolk and in the Fifth Ward, Borough of Queens, New York. The area served contains a population of approximately three million.

7. The Authority is engaged primarily in the purchase and distribution at retail of electricity in the New York counties of Nassau and Suffolk (with certain limited exceptions)

and in a small portion of Queens County known as the Rockaways. The area served contains a population of approximately three million.

8. In connection with the provision of gas service, Brooklyn Union, KeySpan Gas and the Authority are large users of mail services and incur over \$5,500,000 annually in total postal charges, primarily for customers' billing and business reply mail.

9. By notice issued March 16, 1999, the Commission announced two concurrent filings by the United States Postal Service ("Postal Service") of classification and fee proposals relating to non letter-sized Business Reply Mail ("NLSBRM"). In Docket No. MC99-1, the postal service proposes to extend temporarily the existing experimental classification and fees for NLSBRM. In Docket No. MC99-2, the Postal Service has made a permanent classification and fee proposal for NLSBRM. In particular, as part of the permanent plan for NLSBRM, the Postal Service is proposing a per piece fee of 1 cent and a monthly fee of \$600. March 16 Notice at 3.

10. Brooklyn Union, KeySpan Gas and the Authority have a statutory interest in the matters to be heard and decided in this proceeding of such a nature that intervention is necessary and appropriate. Brooklyn Union, KeySpan Gas and the Authority will not be adequately represented by any other party in this proceeding, and unless permitted to intervene and participate as limited participators, may be bound or adversely affected by the Commission's decision herein without an opportunity to have its views heard and considered.

11. Brooklyn Union, KeySpan Gas and the Authority hereby indicate that they wish to be limited participators in this proceeding.

Respectfully submitted,

The Brooklyn Union Gas Company  
KeySpan Gas East Corporation  
Long Island Power Authority

By: Michael W. Hall / PS  
Michael W. Hall  
Cullen and Dykman  
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Washington, D.C. 20036  
(202) 223-8890

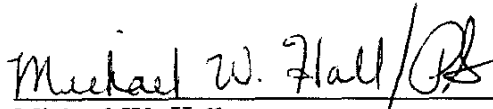
Dated: Washington, D.C.  
April 5, 1999

Of Counsel for  
The Brooklyn Union Gas Company  
KeySpan Gas East Corporation  
Long Island Power Authority

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon the United States Postal Service and Ted P. Gerarden, Acting Director of the Office of the Consumer Advocate in accordance with Section 12 of the Rules of Practice.

Dated at Washington, D.C., this 5th day of April, 1999.

A handwritten signature in cursive script, reading "Michael W. Hall", followed by a stylized flourish or initial.

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